

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

UNITED STATES OF AMERICA

vs.

RACHEL ADAMS (1)

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CRIMINAL NO. 4:15-CR-00151-O

**DEFENDANT RACHEL ADAMS' (01)
UNOPPOSED MOTION FOR EXTENSION OF TIME
TO FILE OBJECTIONS TO THE PRESENTENCE REPORT**

TO THE HONORABLE REED O'CONNOR:

NOW COMES RACHEL ADAMS (01), Defendant in the above styled cause of action and hereby files this her Motion for Extension of Time to File Objections to the Presentence Report by and through her attorney of record, J. Warren St. John, and will show the court the following:

1. Defendant would show that the Presentence Report was received on Wednesday, September 9, 2015. Her Objections to the Presentence Report are due on Tuesday, September 22, 2015.
2. Defendant's attorney of record would show that during the week of September 8, 2015, he was in a murder trial before The Honorable Ruben Gonzalez, 432nd Judicial District Court, Tarrant County, Texas, in the matter of *The State of Texas v. Walter Knight; Cause No. 1380476D*.
3. To allow the Defendant more time to prepare her Objections, Defendant requests a one week extension.
4. Defendant would show that said Motion for Extension of Time to file her Objections

to the Presentence Report is not sought for delay, but so that justice may be done.

WHEREFORE, PREMISES CONSIDERED, Defendant prays that said Motion be granted in all things, that said Objections to the Presentence Report be due on Tuesday, September 29, 2015.

Respectfully submitted,

s/J. Warren St. John
J. WARREN ST. JOHN
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Fort Worth, Texas 76102-6810
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ATTORNEY FOR DEFENDANT (1)

CERTIFICATE OF CONFERENCE

I hereby certify that on September 22, 2015, my office corresponded with Mr. Shawn Smith in order to determine whether the Government would or would not oppose the foregoing Motion for Extension of Time. Mr. Smith has no objection.

s/J. Warren St. John
J. WARREN ST. JOHN

Attorney for Defendant (1)

CERTIFICATE OF SERVICE

I hereby certify that on September 22, 2015, I electronically filed the foregoing document with the clerk for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court. The electronic case filing system sent a "Notice of Electronic Filing" to the following attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means: Mr. Shawn Smith.

s/J. Warren St. John
J. WARREN ST. JOHN

Attorney for Defendant (1)

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ORDER

On this _____ day of _____, 2015, came on to be
considered Defendant's Unopposed Motion for Extension of Time to File Objections to the
Presentence Report and said Motion is hereby:

(GRANTED)

(DENIED)

Objections are due on: _____

SIGNED this _____ day of _____, 2015.

JUDGE PRESIDING